



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/CJN
F. #2019R01145

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 3, 2020

By Email and ECF

Moe Fodeman, Esq.
Wilson Sonsini
1301 Avenue of the
Americas 40th Floor
New York, New York 10019

Re: United States v. Bo Mao
Criminal Docket No. 19-392 (PKC)

Dear Mr. Fodeman:

Enclosed please find the government's second production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous production, and further installments will follow on a rolling basis. The discovery is being produced pursuant to the Protective Order entered by the Court on January 10, 2020. See ECF Docket Entry No. 30. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Transcripts, exhibits, pleadings, and other materials from the civil litigation between Huawei and CNEX	Attorneys' Eyes Only ("AEO") ¹	DOJ_MAO_A_0000000001- DOJ_MAO_A_0000006114

¹ The government is continuing to assess the discovery classification designations for materials in the bates range DOJ_MAO_A_0000000001- DOJ_HUAWEI_A_0000006114 and, depending on the outcome of such review, may reclassify as regular discovery certain materials classified as AEO in this production.

Transcripts, exhibits, pleadings, and other materials from the civil litigation between Huawei and CNEX	Discovery Material ("DM")	DOJ_MAO_A_0000006115- DOJ_MAO_A_0000048237
Licensing agreement with CNEX	Sensitive Discovery Material ("SDM")	BM-000135204- BM- 000135208
Search warrant affidavits	AEO	BM-000135209- BM- 000135234; BM-000135235- BM-000135259

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Alexander Solomon
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By: /s/ Thea D. R. Kendler
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David Lim
Trial Attorneys

Enclosures

cc: Clerk of the Court (PKC) (by ECF) (with Attachment/without Enclosures)